

MEMORANDUM

DAQE-2190-96

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To: FILE - THATCHER COMPANY

Through: Jeff N. Dean, Compliance Manager

From: Anthony DeArcos, Environmental Scientist AD

Date: December 20, 1996



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Subject: Company: THATCHER COMPANY, (B), Salt Lake County
 Location: Salt Lake City, Utah
 Source: Sulfur Dioxide Scrubber
 AIRS #: 035-00119
 AO #: DAQE-078-94, dated September 21, 1994
 Subject: Stack Testing

FINDINGS

- 1) On November 20, 1996, Thatcher Company conducted stack testing to demonstrate compliance with the emission limits stipulated in Condition 19.C. of an AO dated September 21, 1994.
- 2) The testing included EPA Method 6C to determine the emissions of SO₂ from the stack.
- 3) Visible Emissions Observations were performed during the stack tests in accordance with 40 CFR 60, Appendix A, Method 9. The average for the readings was 8.26%, within the Approval Order limit of 15% opacity.
- 4) The testing also appears to have met the minimum performance criteria set forth by UACR and EPA Methods, therefore the results of the testing demonstrates that at the time of testing this source was in compliance with the emission limitations set forth in Condition 19.C. of the above mentioned AO. The results are presented below:

	<u>TEST RESULTS</u>	<u>AO LIMITS</u>
Sulfur Dioxide Scrubber		
SO ₂	0.97 ppm 0.01 lbs/hr	50 ppm 0.3137 lbs/hr

PROBLEMS

- 1) A review of the data submitted in the test report submitted by American Environmental Testing Company, Inc., for Thatcher Company revealed no omissions, errors, or problems. However, there is some confusion caused by the report from American Environmental Testing Company, Inc. The report refers to the testing site as the "Sodium Dioxide Scrubber" rather than the "Sulfur Dioxide Scrubber" numerous times.

RECOMMENDATIONS

- 1) Thatcher Company should be considered in compliance with Condition 19.C. of the September 21, 1994, AO.
- 2) No further action is necessary at this time.

